

## PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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October 27, 1993

Docket Nos. 50-277

50-278

License Nos. DPR-44

DPR-56

STATION SUPPORT DEPARTMENT

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Technical Specifications Change Request 93-15

Gentlemen:

Philadelphia Electric Company hereby submits Technical Specifications Change Request No. 93-15, in accordance with 10CFR50.90, requesting a change to Appendix A of the Peach Bottom Facility Operating Licenses. The proposed change concerns modifying the requirement for the individuals filling certain plant management positions to hold a Senior Reactor Operator License.

Attachment 1 to this letter describes the proposed change and provides justification for the change. Attachment 2 provides the revised Technical Specifications pages.

If you have any questions regarding this matter, please contact us.

Very truly yours,



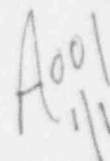
G. A. Hunger, Jr., Director  
Licensing Section

Enclosures: Affidavit, Attachment 1, Attachment 2

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS  
W. P. Dornsife, Commonwealth of Pennsylvania

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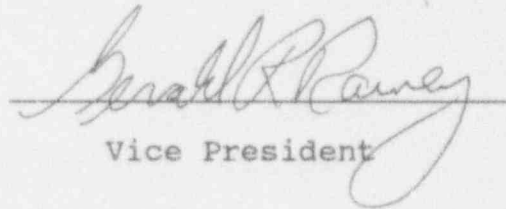
COMMONWEALTH OF PENNSYLVANIA:

: SS.


COUNTY OF CHESTER :

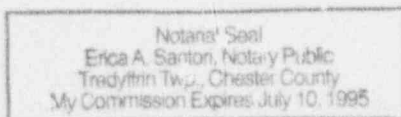
G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company;  
the Applicant herein; that he has read the attached Technical  
Specifications Change Request (Number 93-15) for Peach Bottom  
Atomic Power Station Facility Operating Licenses DPR-44 and DPR-56,  
and knows the contents thereof; and that the statements and matters  
set forth therein are true and correct to the best of his  
knowledge, information and belief.

  
Vice President

Subscribed and sworn to  
before me this 27<sup>th</sup> day  
of October 1993

  
Notary Public



ATTACHMENT 1

PEACH BOTTOM ATOMIC POWER STATION  
UNITS 2 AND 3

Docket Nos. 50-277  
50-278

License Nos. DPR-44  
DPR-56

TECHNICAL SPECIFICATIONS CHANGE REQUEST  
93-15

"Modify the Requirement for Individuals Filling Certain Plant  
Management Positions to Hold a Senior Reactor Operator License"

Supporting Information for Changes - 4 Pages

Philadelphia Electric Company (PECo), licensee under Facility Operating Licenses DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station (PBAPS) Unit No. 2 and Unit No. 3, respectively, requests that the Technical Specifications (TS) contained in Appendix A to the Operating Licenses be amended as soon as possible. Proposed changes to the TS are indicated by vertical bars in the margin of page 244. The proposed revised page 244 for each unit is included in Attachment 2.

#### Description of Change

The proposed TS change is as follows.

Change TS Section 6.2.2, paragraph "g" to: 1) require the Senior Manager-Operations to hold a Senior Reactor Operator (SRO) License; and 2) delete the requirement for the Plant Manager or the Assistant Superintendent-Operations or the Superintendent Technical or the Engineer-Systems to hold an SRO License.

This change is being proposed in order to allow the individuals filling certain plant management positions to focus more time and attention on plant operation without being diverted by the time required to be spent in Licensed Operator Regualification (LOR) training in order to maintain an SRO License. Implementation of the proposed change regarding plant management positions that must hold an SRO License will continue to satisfy the guidance provided by the applicable criteria in ANSI Standard ANSI N18.1-1971, "Standard for Selection and Training of Personnel for Nuclear Plants."

#### Safety Discussion

This proposed TS change involves modifying and deleting the current TS requirement for certain key plant management positions to hold an SRO License. This proposed change does not directly impact any accidents previously evaluated in the Safety Analysis Report because implementation of this proposed change will not involve any physical changes to plant systems, structures, or components (SSC) or the manner in which these SSC are operated, maintained, modified, tested, or inspected. This proposed change will, if approved, allow the individuals filling the affected plant management positions to focus more attention to the day-to-day operations and modifications of the plant while maintaining the requirement that the personnel filling these positions meet the experience and training requirements of ANSI N18.1-1971. The Senior Manager-Operations will continue to be required to hold an SRO License in accordance with ANSI N18.1-1971. Additionally, the Senior Manager-Operations supervises and directs the on-shift Operations organization.

No Significant Hazards Consideration

The change proposed in this Application does not constitute a significant hazards consideration in that:

- i) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of occurrence of an accident is based in part on the training and qualification requirements applicable to the personnel filling key plant management positions. Accordingly, the qualifications and scope of responsibilities applicable to plant management positions relative to the guidance in ANSI N18.1-1971, as described in Updated Final Safety Analysis Report (UFSAR) Section 13.2, "Organizational Structure," were originally reviewed and approved by the NRC during the initial plant licensing. Specifically, UFSAR Section 13.2.3, "Qualifications of Nuclear Plant Personnel," details the following correlation between plant management positions and the criteria in ANSI N18.1-1971:

<u>Plant Management Position</u>	<u>ANSI N18.1-1971</u>	
	<u>SECTION</u>	<u>TITLE</u>
Plant Manager	4.2.1	Plant Manager
Senior Manager-Operations	4.2.2	Operations Manager
Manager-Operations Services	4.3.2	Supervisors Not Requiring AEC Licenses
Manager-Operations Support	4.3.2	Supervisors Not Requiring AEC Licenses
Director-Site Engineering	4.2.4	Technical Manager
Senior Manager-Plant Engineering	4.2.4	Technical Manager
Senior Manager-Design Engineering	4.2.4	Technical Manager

Section 4.2.1, "Plant Managers," of ANSI N18.1-1971 states in part that "...The plant manager shall have acquired the experience and training normally required for examination by the AEC for a Senior Reactor Operator's License. ..." unless the plant organization includes one or more persons who are designated as principal alternates for the plant manager and who meet the nuclear power plant experience and training requirements established for the plant manager. The Plant Manager can conform to the criterion of ANSI N18.1-1971 Section 4.2.1 without holding an SRO License by acquiring nuclear plant experience and training. The Senior Manager-Operations is designated as a principal alternate to the Plant Manager. ANSI N18.1-1971, Section 4.2.2, "Operations Manager," states in part that at the time of "...appointment to the active position...the operations manager shall hold a Senior Reactor Operator's License." Requiring the Senior Manager-Operations to hold an SRO License will continue to ensure conformance with this

criterion. ANSI N18.1-1971, Section 4.3.2, "Supervisors Not Requiring AEC Licenses," does not include any recommendation that these managers have the training to be eligible for, or hold, an SRO license. ANSI N18.1-1971, Section 4.2.4, "Technical Manager," does not include any recommendation that the Technical Manager have the training to be eligible for, or hold, an SRO License.

The proposed TS change would continue to require that the individual responsible for the management of plant operations as well as day-to-day operating activities and conformance to the operating license, TS, and operating procedures demonstrate detailed operating knowledge and successfully complete training required to obtain and hold an SRO License, while deleting the unnecessary requirement that the Plant Manager or the Assistant Superintendent-Operations or the Superintendent-Technical or the Engineer Systems hold an SRO License. Also, licensed plant shift operators will continue to report to a management position filled by an individual who holds an SRO License.

Operations management and Technical management personnel would continue to maintain cognizance of pertinent plant, procedure, and TS changes by virtue of the responsibilities of their plant management positions, TS required PORC membership, and roles in the Emergency Response Organization. These responsibilities include review and or approval of proposed new or revised operating procedures and oversight of LOR training. Therefore, the qualifications of the Operations and Technical Management personnel will remain at the currently required level. Furthermore, these key plant management individuals who will no longer be required to hold an SRO License will be able to devote the time now spent in LOR training to increase their overview and involvement in plant operation and planning activities. Accordingly, the probability of occurrence of an accident previously evaluated in the Safety Analysis Report (SAR) that was based on the training and qualification of key plant management personnel is not increased by the proposed change to the current SRO License requirements.

The consequences of an accident previously evaluated in the SAR could be affected by the qualification of plant management personnel to which the plant operators report via the chain of command. As explained above, the proposed TS change to require the manager in the licensed operator chain of command to hold an SRO License will continue to meet the guidance provided by the applicable criteria in ANSI N18.1-1971.

This proposed change does not involve any changes to plant SSC, or in the manner in which plant SSC are operated, maintained, modified, tested, or inspected. Therefore, the proposed TS change does not increase the consequences of accidents previously evaluated in the SAR.



Accordingly, as explained above, the proposed TS change does not involve an increase in the probability or consequences of an accident previously evaluated.

- ii) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed change involving the qualification (e.g., obtain and hold and SRO License) of key plant management personnel cannot create the possibility of a new or different type of accident than previously evaluated in the SAR because no substantive change to the current requirements is involved as discussed above. Also, because the proposed TS change does not involve physical changes to plant SSC, the possibility of creating a different type of accident than previously evaluated in the SAR cannot be created. Therefore, the possibility of a different type of accident than previously evaluated in the SAR is not created.

- iii) The proposed changes do not involve a significant reduction in a margin of safety.

The margin of safety of overall plant operating activities is based in part on the TS requirements that personnel serving in key plant management positions satisfy qualification criteria specified in ANSI N18.1-1971. The proposed change to the TS does not reduce these established qualifications that key plant management personnel must currently satisfy. In addition, implementation of the proposed TS changes will allow the affected plant management individuals to use the time now spent in LOR training (i.e., approximately one week out of every six week period throughout the year) to increase their involvement in plant operational matters and planning activities. Therefore, the proposed TS change does not reduce the margin of safety.

#### Environmental Assessment

An environmental impact assessment is not required for the changes proposed by this Application because the changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10CFR51.22(c)(9).

#### Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed the proposed change to the TS and have concluded that it does not involve an unreviewed safety question and is not a threat to the health and safety of the public.